US ERA ARCHIVE DOCUMENT



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

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1-12-83 MEMORANDUM

TO:

Richard Mountfort, PM #23

Registration Division (TS-767)

THRU:

Bruce Jaeger, Section Head

Review Section #1

Toxicology Branch/HED (TS-769)

SUBJECT:

Caswell No. 315. Dimethylamine salt of 2,4-D and Butoxyethanol ester of 2,4-D in water.

Re: 11683-EUP-2 and 11683-EUP-3 (expired 12/28/82)

with OG 2301 and OH 5252.

## Background:

EUP's using both the salt and ester of 2,4-D were previously reviewed by Toxicology Branch. At that time a concern was stated over the possible degradation of these compounds to the dichlorophenol and/or dimethyl nitrosamine in the water environment. The EUP requestors, Bur. of Reclamation and the Corps of Engineers, added those parameters to their testing program. Data from those EUP's were submitted.

## Comments:

- 1. Toxicology Branch can not comment on the values obtained for the following reasons: a. methodology review for the analysis in water is the preview of RCB., b. values submitted do not appear to be appropriate (Table 16, Table 17)
- 2. Toxicology Branch questions whether the DMA of 2,4-D was contaminated prior to use.
- 3. Toxiocology Branch cannot provide a hazard evaluation requested on the use without RCB's review and input of the submitted data.

Henry Spencer, Ph.D. ful 1/10/83
Review Section #1
Toxicology Branch/HED (15/769)

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